

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BAY STATE GAS COMPANY)	
)	
)	D.T.E. 06-31

**PETITION TO INTERVENE OF THE UNITED STEELWORKERS
OF AMERICA, AFL-CIO-CLC**

Pursuant to 220 C.M.R. 1.03(1)(a), the United Steelworkers of America, AFL-CIO/CLC (Steelworkers) requests that the Department of Telecommunications and Energy ("Department") grant it leave to intervene as a party in the above-captioned docket.

As grounds therefore, Steelworkers states:

1. Since December 1998, Steelworkers has been the chief signatory to all collective bargaining agreements with Bay State Gas Company ("Company"), concerning the terms and conditions of employment of its affiliate local, USWA Local 12026 ("Local 12026").
2. The membership of Local 12026, comprises all clerical and operations employees employed by the Company within the metropolitan area of Springfield, Massachusetts. Local 12026 members are assigned to work in the field, at the Company headquarters and at the Company Call Center serving Massachusetts, Maine, and New Hampshire.
3. The Department's Rules permit the grant of full participation to any party with a substantial and specific interest. 220 C.M.R. 1.03(1)(e).
4. Steelworkers and its members have a substantial and specific interest in the pending investigation of the company's staffing and related matters and in the company's announced intention to contract out their work.
5. The Steelworkers has been granted party status in proceedings involving proposed rate changes, Bay State Gas Company, DTE No. 05-27.
8. No other party can adequately represent or address Steelworkers' interests and those of its members in this case.
9. Steelworkers intends to participate as a full participant and take part in issues that may substantially and specifically affect its membership.

10. For the foregoing reasons, and for the same reasons that it was granted leave to intervene in prior Departmental dockets related to rate changes, Steelworkers will be substantially and specifically affected by the Department's review and decision in this docket.

WHEREFORE, Steelworkers, by and through its attorneys, respectfully requests that this Petition to Intervene be granted and that the United Steelworkers of America be accorded full participant intervention status in this proceeding.

Respectfully submitted,

UNITED STEELWORKERS OF
AMERICA,

By its attorneys,

/s/ Warren H. Pyle

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Dated: April 25, 2006

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2006, I caused a copy of the foregoing Petition To Intervene to be served by first class mail, postage pre-paid upon the following service list:

/s/ Warren H. Pyle
Warren H. Pyle

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